

NSR Retooling Team March 30, 2004

Wisconsin Department of Natural Resources

Additions Necessary

- Wisconsin NSR program is supported by program revenue
- Program relies on revenue generated by NSR permit actions
- Many projects required PSD/NSR review
- Significant work necessary by NSR funded staff to prepare exclusions from PSD/NSR

Exclusions Where Significant Work Effort May Be Necessary

- Comparable to BACT determinations under Clean Unit Test
- Establishment of PAL
- Development of Pollution Control Project criteria
- Review of Determination Requests under the Applicability Test

NR 410 Change Ideas Clean Units

- Comparable to BACT fee based upon PSD/NSR BACT/LAER fee
- Fee for Examination of Clean Unit Status if Area changes from Attainment to Nonattainment
- Modeling fee if modeling is necessary based upon minor modification model rate

NR 410 Change Ideas Plantwide Applicability Limits

- Fee based upon synthetic minor cap fee
- Fee per significant emissions unit
- Nonattainment area fee somewhat higher than attainment area due to declining cap evaluation
- Fee for review of activity requiring significant revision to Title V permit (significant new or replacement unit and significant modification to existing equipment
- Modeling fee based upon minor modification rate

NR 410 Change Ideas Pollution Control Projects

- Fee based upon minor NSR fee schedule
 - model
 - per emission unit
- Charge for review of "environmentally beneficial test" for non listed projects

NR 410 Change Ideas Applicability Test

- Fee for requested review of exemption request
- Emissions netting and associated enforceable conditions
- Number of emissions units affected by the change